

# **Exhibit A**

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***VIRGINIA GIUFFRE VOLUME II***

*11/14/2016*

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***Agren Blando Court Reporting & Video, Inc.***

*216 16th Street, Suite 600*

*Denver Colorado, 80202*

*303-296-0017*

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

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CONFIDENTIAL VIDEO DEPOSITION OF  
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

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APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP

By Sigrid S. McCawley, Esq.

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Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

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6 Appearing on behalf of the

Defendant

7 Also Present:

8 Ann Lundberg, Paralegal

Maryvonne Tompkins, Videographer

1           A       They stay with me, and then between me,  
2       then they go back to their sister -- my -- not my  
3       sister -- my husband's sister, who lives in New South  
4       Wales, and then back to us. And then we're also  
5       trying to get my brother-in-law involved, who lives  
6       in Melbourne, so...

7           Q       And how frequently do they rotate in and  
8       out of your house?

9           A       Quite often.

10          Q       And did that begin right when you moved  
11       back to Australia?

12          A       That's the biggest reason that we moved  
13       back to Australia was my husband has a very close  
14       relationship with his parents. They're Italian, so  
15       everything has got to be close close, and my husband  
16       couldn't let my father-in-law pass away without being  
17       there with him.

18          Q       And he's not passed away, correct?

19          A       No. Multiple surgeries and he's got  
20       asbestos (sic), and he's not doing well, but he's --  
21       he's -- he's doing okay now but he's not in the best  
22       health shape. I mean, and given the fact that he's  
23       like 83, so...

24          Q       But you do help take care of him?

25          A       Yes.